UNITED STATES DISTRICT COURT

SOUTHERN	DIST	TRICT OF	FLORIDA
Cruz Valdivieso Fig	uera	EXHIBI	IT AND WITNESS LIST
V. VIP Care Inc. et	al	Case 1	Number: 22-cv-61553 WPD
PRESIDING JUDGE William P. Dimitrouleas	PLAINTIFF'S ATTOR B. Pollock	NEY LUMP AVEREN	DEFENDANT'S ATTORNEY Goldberg, R
TRIAL DATE (S) 10/30/23 10/31 11	COURT REPORTER Laura Melton		COURTROOM DEPUTY Crystal Barnes-Butler Scraen Clean
PLF. DEF. DATE MARKED A NO. NO. OFFERED MARKED A	DMITTED 4	DESCRIPTION OF EX	HIBITS* AND WITNESSES
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1 10/31	AugelA	Melennez	(zoom)
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	Dimon	T MINIKE	
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	9	ee attached	exhibitlists
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^{*} Include a notation as to the location of any exhibit not held with the case file or not available because of size.

United States District Court									
SOUTHERN DISTRICT OF FLORIDA-MIAMI DIVISION									
CRUZ VALDIVIESO FIGUERA,							JOINT EXHIBIT LIST		
	•								
•	Plaintiffs	,				CASE NO : 0:2	CASE NO.: 0:22-CV-61553-DIMITROULEAS/HUNT		
vs.						GREET VO.: 0.22 CV 01333 BINITING GEBEIGHT			
ALL VIP CARE INC. AND LIZ VELAZQUEZ MCKINNON,				ION,	·				
	Defenda	nts.							
WILLIAM P. FA. DIMITROULEAS Brid 135 Sui			FAIR Brian 135 S Suite	AINTIFF'S ATTORNEY AIRLAW FIRM rian H. Pollock, Esq. 5 San Lorenzo Ave nite 770 oral Gables, FL 33146		FLORIDA HEALTHCARE LAW FIRM. Randy M. Goldberg Esq., 151 NW 1 st Avenue., Delray Beach, FL 33444			
ر د د ا			T REPORTER		COURTROOM DEPUTY				
JOINT				MRA Melto	<u> </u>	Seemwe Creay Cry to Bress Butte			
NO	DATE OFFERED	MARKED	OBJEC	CTIONS	ADMITTED		Exhibit		
1					10/30	All VIP Care Letter regarding Application			
2					Ŋ	Application for Contract or Employment*			
3			-		' '\	Independent Contractor Agreement*			
4					,	Acknowledgement of Nurse Registry Policy & Procedure*			
5					~	Home Health Aide/Certified Nursing Assistant Job Description			
6		 					Affidavit of Compliance with Background Screening		
7					81	Independent Contractor Professional Liability Policy			
8		-			- 1	Waiver of Professional Liability Insurance			
9					N	Time Records Plaintiff's Paystubs			
11		 			1	HHA Exchange Patient Calendar			
12					'n	Defendants' Response to Plaintiff's Request for Production			
13			-	,	v	Defendant, All VIP's Answers to Plaintiff's Interrogatories			
14					į,	Defendant, Velazquez McKinnon's Answers to Plaintiff's Interrogatories			

^{*} Pending the Court's ruling on Plaintiff's Motion in Limine [ECF No. 91], Plaintiff submits that the references

AO 187 (Rev. 7/87) Exhibit and List

United States District Court								
SOUTHERN DISTRICT OF FLORIDA-MIAMI DIVISION								
CRUZ VALDIVIESO FIGU	JERA,		PLAINTIFF'S AMENDED EXHIBIT LIST WITH					
Plaintiffs,			DEFENDANT'S OBJECTIONS					
VS.			CASE NO.: 0:22-CV-61553-DIMITROULEAS/HUNT					
ALL VIP CARE INC. AND LIZ VELAZQUEZ MCKINNON,								
Defendants.			·					
PRESIDING JUDGE								
HONORABLE	PLAINTIFF'S			DEFENDANT'S ATTORNEY				
WILLIAM P.	FAIRLAV			FLORIDA HEALTHCARE LAW FIRM.				
DIMITROULEAS		Pollock, Esc		Randy M. Goldberg Esq.,				
		Lorenzo Ave	3	151 NW 1st Avenue.,				
Suite 77		• • •		Delray Beach, FL 33444				
	Corai Gau	Coral Gables, FL 33146						
TRIAL DATE(S). COURT REPORTER				COURTROOM DEPUTY				
October 25, 2023, 20131 COURT REPORTER HAURA ME HON				JERMANNECREARY Chyefal bines Both				
PLTF. DATE MARKED OFFERED	OBJECTIONS ADMITTED			Exhibit				
·	I, H, R UP	<u> </u>		Cesar Izique Sr. Letter Statement				
	I, H, R UP			All VIP Website Homepage				
	I, H, R UP	ļ,		Check #517,				
	I, H, R UP	10/30) Check #2414	Check #2414				
	I, H, R UP			Unpaid Wages email to Leslie Rodriguez				
	I, H, R UP	 	Email from Ana Maria Rowland					
	I, H, R UP	<u> </u>	Humana Records					
	I, H, R UP	 	Google Review to All VIP Care Inc.					
	I, H, R UP	 	Text Messages from Evelyn Vapi					
	I, H, UP			ges between Plaintiff and Diane Ramirez				
11 A,	I, H, UP	1 11 1. 11.4	Excel Spread	dsheet Summarizing Pay Records				

Plaintiff reserves the right to amend this exhibit list.

Respectfully Submitted on October 17, 2023.

s/Brian H. Pollock, Esq.
Brian H. Pollock, Esq.
Fla. Bar No. 174742
brian@fairlawattorney.com
FAIRLAW FIRM
135 San Lorenzo Avenue
Suite 770
Coral Gables, FL 33146
Tel: 305.230.4884
Counsel for Plaintiff

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